State SNAP Agency
NDNH Matching Program Performance Report

OMB Information Collection Request
0970 - 0464

Supporting Statement
Part A – Justification

December 2024

Type of Request: Revision

Submitted By:
Office of Child Support Services
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

State agencies that administer Supplemental Nutrition Assistance Programs (SNAP) are mandated by federal law to participate in a computerized matching program with the federal Office of Child Support Services (OCSS). The computerized matching program compares each state SNAP agency's applicant and recipient information with employment information maintained in the National Directory of New Hires (NDNH). The outcomes of the computerized match provide each state SNAP agency with information that will help to establish or verify an individual's eligibility for SNAP benefits. Determining eligibility also helps each state agency reduce payment errors, identify duplicate participants, and maintain program integrity. To receive NDNH information, each state SNAP agency must enter into a computer matching agreement with OCSS and adhere to its terms and conditions, including providing OCSS with an annual performance outcomes report.

The legal authority for the information collection activities associated with the SNAP performance report is: 1) subsection 453 (j)(10) of the Social Security Act (42 U.S.C. § 653(j)(10)), which allows the Secretary of the U.S. Department of Health and Human Services to disclose information maintained in the NDNH to state agencies administering SNAP under the Nutrition Act of 2008, as amended by the Agriculture Act of 2014; and 2) the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988 (5 U.S.C. § 552a), which sets forth the terms and conditions of a computer matching program; and 3) the Government Performance and Results Modernization Act of 2010, (Pub. L. 111-352, § 4, 124 Stat. 3865, 3871-73 (2011)), which requires agencies to report program performance outcomes to the Office of Management and Budget (OMB) and for the reports to be available to the public.

This is a revision of a currently approved information collection. See A.15 for details.

2. Purpose and Use of the Information Collection

OCSS uses the information collected in the annual performance outcomes reports to measure state SNAP agency cost savings that are attributable to the SNAP-NDNH computerized matching program.

OMB requires OCSS to report performance measurements demonstrating how the use of NDNH information supports the OCSS strategic mission, goals, and objectives. OCSS fulfills the performance measurements reporting requirement by compiling the state agency outcomes in the OCSS periodic performance measurement report that is included in the U.S. Department of Health and Human Services report to the OMB Information Technology Dashboard; the Annual Report to Congress; and by periodically submitting new computer matching agreements, which include cost-benefit analyses that are derived from the SNAP agencies' annual performance outcomes reports, to OMB and Congress for review and approval.

3. Use of Improved Information Technology and Burden Reduction

The performance outcomes reporting tool for this information collection is a commonly used electronic, formatted spreadsheet that performs automated data calculations of inputted values. OCSS sends the performance measurements reporting tool to the state SNAP agencies electronically. States populate and then submit the completed reporting tool to OCSS electronically. Using available technology and electronic processes eliminates manual calculations and computation errors, as well as eliminates costs required to submit the report by mail.

4. Efforts to Identify Duplication and Use of Similar Information

State SNAP agencies' performance outcomes, attributable from computerized comparisons with the NDNH, are unique and not available from other sources.

5. Impact on Small Businesses or Other Small Entities

There is no impact on small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

OCSS requires state SNAP agencies to provide their performance outcomes report annually. Collecting the information less frequently would result in OCSS providing outdated cost-savings measurements and inaccurate periodic performance reports to OMB. Not collecting the information at all would also jeopardize compliance with the federal requirement for OCSS to provide OMB with the periodic performance reports.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Not applicable.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and OMB regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), OCSS published a notice in the Federal Register at 89 FR 63434 on August 5, 2024. The notice announced the OCSS intention to seek OMB approval of the SNAP PO information collection and provides a 60-day period for the public to submit written comments about this information collection activity. OCSS did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

The information collected does not contain personally identifiable information; therefore, there are no confidentiality issues.

11. Justification for Sensitive Questions

OCSS does not collect sensitive information in the performance outcomes report.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

The estimated hourly burden per response is based on feedback from a few SNAP agencies that informed OCSS of the average time it takes staff to populate the performance reporting tool.

Estimated Cost to Respondents

OCSS calculated the cost to respondents using the Bureau of Labor Statistics (BLS) job code for Child, Family, and School Social Worker 21-1021 and wage data from May 2023 (https://www.bls.gov/oes/2023/may/oes_nat.htm#21-0000), which is $28.46 per hour. To account for fringe benefits and overhead, the rate was multiplied by two, totaling $56.92. The estimate of annualized cost to respondents by burden hour is $56.92 times 43.99 hours, totaling $2,503.91

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Annual Burden Hours Per Response	Total Annual Burden Hours	Average Hourly Wage	Total Annual Cost
SNAP Agency Matching Program Performance Reporting Tool and Instructions	53	1	0.83	43.99	$56.92	$2,503.91
Estimated Annual Burden Total:				**43.99**	**Estimated Annual Cost Total:**	**$2,503.91**

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no capital, start-up, or ongoing costs required of the respondent to populate the performance reporting tool because it is a pre-formatted and universally used desktop application that states submit electronically to OCSS.

14. Annualized Cost to the Federal Government

The cost to the federal government to administer the SNAP-NDNH computer matching program is included in the overall cost to the federal government to operate and maintain the NDNH (OMB # 0970-0166), which is estimated to be $10.9

million. This cost includes the system development and technical assistance contracting costs and telecommunications, security, data quality, software, and hardware costs incurred by OCSS in association with the NDNH.

There are no other costs to the federal government for this information collection because the reporting tool is a universally used desktop application that states receive electronically.

15. Explanation for Program Changes or Adjustments

The performance reporting tool and instructions underwent edits to the contacts, formatting, and grammar which included changing "Office of Child Support Enforcement (OCSE)" to "Office of Child Support Services (OCSS)." These program changes do not affect the burden hour or costs.

The annualized cost to respondents increased from the previous approval. This adjustment is a result of an increase in the average hourly wage of state agency program staff, per the BLS's National Compensation Survey, published since the previous approval.

16. Plans for Tabulation and Publication and Project Time Schedule

OCSS periodically provides OMB and Congress with reports, which includes the compiled information collected from each state SNAP agency performance report.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.